1	MELINDA HAAG (CABN 132612) United States Attorney		
2 3	J. DOUGLAS WILSON (DCBN 412811) Chief, Criminal Division		
4 5 6	ANDREW S. HUANG (CABN 193730) Assistant United States Attorney 1301 Clay Street, Suite 340S Oakland, California 94612 Telephone: (510) 637-3680 FAX: (510) 637-3724		
7 8	andrew.huang@usdoj.gov Attorneys for United States of America		
9	Theories for Clinea States of Timerica		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	OAKLAND DIVISION		
13	UNITED STATES OF AMERICA,) NO. CR 12-00751-002 SBA (KAW)	
14	Plaintiff,)) STIPULATION AND [PROPOSED] ORDER TO	
15	V.) CONTINUE CHANGE OF PLEA HEARING)	
16	DANIEL M. LANDIN,))	
17	Defendant.		
18		_)	
19	The parties, by and through undersigned counsel, stipulate as follows and move for a		
20	continuance of the change of plea hearing to November 4, 2013, at 9:30 a.m. before the Honorable		
21	Kandis A. Westmore, United States Magistrate Judge:		
22	1. On October 24, 2013, the Honorable Saundra Brown Armstrong referred this case for		
23	acceptance of defendant Daniel M. Landin's guilty plea before Magistrate Judge Westmore on		
24	November 1, 2013, at 9:30 a.m.		
25	2. The parties have negotiated a plo	ea agreement and are awaiting final approvals from the	
26	government. It is anticipated that such approva	ls will be obtained by the morning of November 1, 2013.	
27	3. The Court requires submission of	of the plea agreement for the Court's review prior to a	
28	change of plea hearing. A continuance will allow for advance submission of the plea agreement.		
	STIP. & [PROP'D] ORD. NO. CR 12-00751-002 SBA (KAW)		

1	4. In the referral for ac	ceptance of guilty plea, the Court ordered that the matter be set for
2	consideration of her report and recommendation on acceptance of guilty plea and judgment and	
3	sentencing for Tuesday, January 21, 2014, at 10:00 a.m., before the Honorable Saundra Brown	
4	Armstrong. The parties believe that this date remains acceptable.	
5	WHEREFORE, the parties respectfully request that the change of plea hearing presently set for	
6	November 1, 2013, be continued to November 4, 2013, at 9:30 a.m. on the Criminal Duty Magistrate	
7	Judge's calendar for acceptance of guilty plea.	
8	SO STIPULATED.	
9		MELINDA HAAG United States Attorney
10	October 31, 2013	/0/
12	October 31, 2013	ANDREW S. HUANG Assistant United States Attorney
13		Assistant Cinted States Attorney
14	October 31, 2013	/s/
15	·	ADAM PENNELLA, Esq. Counsel for Defendant Landin
16		
17	SO ORDERED.	
18		
19	_10/31/13 Date:	Hon KANDIS A. WESTMORE
20	Date.	United States Magistrate Judge Northern District of California
21		Trofulerii Bistrict of Cumorina
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STIP. & [PROP'D] ORD. No. CR 12-00751-002 SBA (KAW)